

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,  
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Reorganized Debtors.<sup>1</sup>

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**NOTICE OF INTENT TO ADDUCE TESTIMONY FROM A REMOTE LOCATION  
BY TELEPHONE AND VIDEO TECHNOLOGY**

1. This Notice is filed pursuant to BLR 9017-1(c)(2)(B) by Tribolet Advisors, LLC, in its capacity as Plan Administrator (the “Plan Administrator”) in the above-captioned bankruptcy cases.
2. This Notice pertains to the matters scheduled for hearing or trial in this case on October 5, 2023, at 1:30 p.m. prevailing Central Time.
3. The Plan Administrator is unsure whether claimant Nelu Mihai intends on appearing in person or remotely. Therefore, out of an abundance of caution, the Plan Administrator provides this notice that it intends to call (either as an adverse witness, or to cross-examine if necessary) Nelu Mihai to testify at the scheduled hearing or trial by telephone and video technology.

---

<sup>1</sup> On September 28, 2023, the Court entered the *Final Decree Closing Certain Cases and Amending Caption of Remaining Cases* [Docket No. 1287], closing the chapter 11 cases of the following sixteen entities: Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The chapter 11 cases of the remaining three Reorganized Debtors: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); and Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551), shall remain open and jointly administered under the above caption. The Reorganized Debtors’ service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

4. Any party-in-interest may object to this notice within 3 days of its filing on the Court's docket. If no party-in-interest files a timely objection, the Court will allow the identified witness to give testimony remotely using the Court's telephone and video technology. If the Court does not authorize the testimony to be taken remotely, the Court will schedule a date for the witness's testimony to be given live in open court. Both the witness and the objector must appear in person at the scheduled date.
5. This Notice may be withdrawn at any time prior to the scheduled hearing or trial.

Dated: September 28, 2023

Respectfully submitted,

/s/ Charles R. Gibbs  
Charles R. Gibbs  
Texas State Bar No. 7846300  
**MCDERMOTT WILL & EMERY LLP**  
2501 North Harwood Street, Suite 1900  
Dallas, TX 75201-1664  
Telephone: (214) 295-8000  
Facsimile: (972) 232-3098  
Email: crgibbs@mwe.com

– and –

Kara E. Casteel (admitted *pro hac vice*)  
Jennifer A. Christian (admitted *pro hac vice*)  
Nicholas C. Brown (admitted *pro hac vice*)  
**ASK LLP**  
2600 Eagan Woods Drive, Suite 400  
St. Paul, MN 55121  
Telephone: (651) 289-3846  
Facsimile: (651) 406-9676  
E-mail: kcasteel@askllp.com  
jchristian@askllp.com  
nbrown@askllp.com

*Counsel to the Mining Project Wind Down Holdings,  
Inc. Litigation Trust and the Plan Administrator*